

EXHIBIT B

Declaration of Joseph Silva

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17 *Ultimate Fighting Championship and UFC*

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
26 Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF JOSEPH SILVA IN
SUPPORT OF DEFENDANT ZUFFA,
LLC'S MOTION FOR
RECONSIDERATION OF RULING ON
TESTIMONY AT SEPTEMBER 23, 2019
EVIDENTIARY HEARING**

1 I, Joseph Silva, declare as follows:

2 1. I am over 21 years old. I have personal knowledge of the facts stated in this
3 declaration and if called to testify, I could and would competently testify to these facts.

4 2. I make this declaration in support of Defendant Zuffa, LLC's Motion for
5 Reconsideration of Ruling on Testimony at September 23, 2019 Evidentiary Hearing.

6 3. I was employed at the UFC from 1994 through 2016. I was at the UFC when Zuffa,
7 LLC acquired it and continued to work there under Zuffa.

8 4. At the time of my departure, my official title was Vice President of Talent Relations.
9 My colloquial title was "matchmaker" because part of my job responsibility was to decide who
10 would fight who on UFC shows. As part of this, I negotiated with athletes to sign contracts with
11 Zuffa, including negotiating athlete compensation.

12 5. I did not know Zuffa's event revenues when I negotiated athlete compensation.

13 6. At no point was I told by Zuffa that I had a budget for athlete compensation.

14 7. At no point was I told by Zuffa that I was spending too much on athletes.

15 8. I never heard of the concept of paying athletes a share of revenues until I learned
16 about this lawsuit.

17 9. When I was negotiating with athletes, no athlete ever asked me for a contract wherein
18 the athlete would earn a certain percentage of the event revenue as payment.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing facts are true and correct. Executed this 26th day of September, 2019 in Richmond, VA.

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22 Joseph Silva
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